

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
REDIRECTED FROM WITNESS MODEN
(DMA/USPS-T14-14(B) AND 24(C)-(E))

The United States Postal Service hereby provides responses to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T14-14(b) and 24(c)-(e), filed on August 29, 1997, and redirected from witness Moden.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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August 29, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO THE
INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION
REDIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-14. Please refer to your response to DMA/USPS-T4-3(a) in which you state that "It is expected that the number of city carriers will continue to decrease as additional zones are put on DPS, but I am unable to give you a projection on how many fewer city carriers will be employed."

- a. Please define "zone".
- b. Please describe in detail the places where the cost implications of the future reductions in the number of city carriers are reflected in the Postal Service's Test Year cost estimates.

Response:

- a. Response provided by witness Moden.
- b. The cost implications in future reductions in the number of city carriers are available in Exhibit C of Library Reference H-10. See also the testimony of witness Hume, USPS-T-18, who has incorporated DPS savings to develop delivery costs by rate category.

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DMA/USPS-T4-24

- c. Please provide the percentage of total mail processing direct labor work hours in 1996 performed by Casual and Part Time workers. Please also provide such information by A/P.
- d. Please provide the average number of hours that a Casual worker works per week. Please also provide such information by A/P.
- e. Please provide the average number of hours that a Part Time worker works per week. Please also provide such information by A/P.

Response:

c, d & e. The requested information is shown in the attached table. It was derived from USPS files as described in the attachment. Complement data (NORPES) is a census as of the middle of each AP while workhour data is, of course, the total for the AP.

National F-1 Complement
FY 96

Year	AP	Full Time	Part Time	Clerk	Mail Handler	Mail Handler	Transitional
96	01	110,270	12,729	47,851	4,506	15,958	23,895
96	02	110,244	12,973	47,948	4,500	16,456	25,624
96	03	110,067	13,071	47,959	4,578	18,504	27,860
96	04	110,173	13,424	48,044	4,510	60,127	26,969
96	05	110,072	13,660	47,972	4,536	18,616	26,620
96	06	110,499	13,348	48,027	4,532	17,836	28,321
96	07	110,439	13,940	48,098	4,564	17,295	28,220
96	08	110,624	13,904	48,125	4,753	15,994	28,948
96	09	110,813	13,936	48,294	4,815	15,333	29,721
96	10	110,710	14,202	48,352	4,956	14,904	29,561
96	11	110,771	14,342	48,385	4,936	17,764	27,904
96	12	110,631	14,249	48,341	4,931	15,376	27,711
96	13	110,618	14,144	48,359	4,809	14,887	26,794

National
F-1 Work Hours FY 96

AP 01	AP 02	AP 03	AP 04	AP 05	AP 06	AP 07	AP 08	AP 09	AP 10	AP 11	AP 12	AP 13	Total
16,461,563	16,542,089	15,937,664	16,469,462	15,785,438	15,826,182	15,964,019	15,918,897	15,715,304	14,807,730	14,598,207	15,211,821	15,520,227	204,758,603
Clerk FT	2,014,137	2,066,189	2,245,780	2,090,420	2,063,050	2,118,713	2,108,936	2,072,705	2,039,726	2,111,894	2,048,192	2,115,934	27,116,152
Clerk PT	7,368,471	7,150,690	7,043,443	6,951,256	6,993,159	7,084,822	7,088,383	6,976,760	6,593,347	6,389,746	6,752,123	6,989,493	90,636,363
MH FT	7,254,670	7,368,471	7,150,690	7,043,443	6,951,256	6,993,159	7,084,822	7,088,383	6,976,760	6,389,746	6,752,123	6,989,493	90,636,363
MH PT	693,463	692,662	725,420	683,554	688,405	688,896	724,928	722,899	720,968	737,348	713,895	736,024	9,267,815
Casuals	2,396,157	2,511,604	3,589,707	2,796,581	2,732,077	2,639,700	2,426,205	2,289,537	2,153,988	2,340,956	2,349,837	2,288,547	37,220,724
Transitional	2,944,661	3,106,338	3,334,293	3,643,378	3,091,587	3,200,855	3,284,405	3,234,185	3,035,559	2,803,697	2,805,021	2,745,949	40,447,466
Total Hours	31,764,651	32,241,540	32,813,963	36,837,244	31,398,836	31,520,411	31,697,005	31,551,754	31,011,390	29,351,318	28,981,948	30,396,174	409,447,123

By AP
Percent of Total Mail Processing work hours

AP 01	AP 02	AP 03	AP 04	AP 05	AP 06	AP 07	AP 08	AP 09	AP 10	AP 11	AP 12	AP 13	Annual
7.54%	7.79%	10.97%	18.18%	8.91%	8.67%	8.33%	7.69%	7.38%	7.34%	8.08%	7.86%	7.53%	9.09%
Casuals	8.52%	8.41%	8.51%	8.10%	8.83%	8.73%	8.86%	9.01%	9.41%	9.83%	9.24%	9.38%	8.89%
Part-Time													

Average Number of work hours per week

AP 01	AP 02	AP 03	AP 04	AP 05	AP 06	AP 07	AP 08	AP 09	AP 10	AP 11	AP 12	AP 13
37.54	38.16	48.63	27.84	37.55	38.29	38.16	37.92	37.33	36.13	32.95	38.21	38.43
Casuals	38.82	39.54	41.61	38.11	38.47	37.93	37.97	37.27	36.03	36.95	36.00	37.62
Part-Time	39.27											

NOTES: Analysis excludes F-1 Supervision and Training hours
Analysis includes Christmas Casuals

Data Source and Methodology:

Work hours were formulated from the National Payroll Man Hours Summary File (NPMHSF)

NPMHSF reference numbers used for:

Full Time Mail Handler 1200

Part Time Mail Handler 1210

Full Time Clerks 1100

Part Time Clerks 1110

Casuals - 2932 minus NonBargaining Temporary 2920

Transitional - 2935

Comment was formulated from the National On Roll Paid Employees File (NORPEF)

NORPEF reference numbers used for:

Full Time Mail Handler 0610 and 2820

Part Time Mail Handler 0620 and 0630

Full Time Clerks 1610 minus Mail Handlers - 0610

Part Time Clerks 1620 and 1630 minus Mail Handlers - 0630 and 0620

Casuals - 2930 and 2936

Transitional - 2935

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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